



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

January 5, 2016

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8019 5630

Mr. Jim Gilmartin
Contract Program Manager
Internal Services Department
County of Los Angeles
1104 North Eastern Avenue, Room, 225
Los Angeles, California 90063
jgilmartin@isd.lacounty.gov

**SUBJECT: FAILURE TO COMPLY; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT THE ALAMEDA STREET GARAGE, 1055 NORTH ALAMEDA
STREET, LOS ANGELES**

Dear Mr. Gilmartin:

As of the date of this letter, the State Water Resources Control Board (State Water Board) has not received a complete response to our October 28, 2015 Notice of Violation (NOV)(attached). You are directed to correct the ongoing violations identified in the NOV and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within ten (10) days from the date of this letter.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Bernard Sanchez
Fire Inspector
Los Angeles City Fire Department
200 Main Street, Suite 1700
Los Angeles, California 90012
bernard.sanchez@lacity.org

Failure to comply with this notice may result in an enforcement action by the State Water Board. The State Water Board reserves the right to bring an action against the owner and/or operator of the tank(s) in violation, or it may recommend that the Los Angeles City Fire Department pursue enforcement, or the Los Angeles City Fire Department may elect to pursue enforcement independently.

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

January 5, 2016

If you have any questions, please contact me at (916) 341-5551, or by email at Amantha.Henkel@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Amantha Henkel". The signature is fluid and cursive, with the first name "Amantha" and last name "Henkel" clearly distinguishable.

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

Attachment: October 28, 2015 Notice of Violation

cc: *(via email only)*

Ms. Anna Olekszyk
Los Angeles City Fire Department
anna.olekszyk@lacity.org

Captain Daniel Dragotto
Los Angeles City Fire Department
daniel.dragotto@lacity.org

Mr. Bernard Sanchez
Los Angeles City Fire Department
bernard.sanchez@lacity.org

Mr. Jim Jones, Director
Los Angeles County, Internal Services Department
jjones@isd.lacounty.gov

Mr. Dave Chittenden
Chief Deputy Director
Los Angeles County, Internal Services Department
dchittenden@isd.lacounty.gov



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MATTHEW RODRIGUEZ
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ENVIRONMENTAL PROTECTION

State Water Resources Control Board

October 28, 2015

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7015 0640 0006 0950 4360

Mr. Jim Gilmartin
Contract Program Manager
Internal Services Department
County of Los Angeles
1104 North Eastern Avenue, Room 225
Los Angeles, California 90063
JGilmartin@isd.lacounty.gov

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT THE ALAMEDA STREET GARAGE, 1055 NORTH ALAMEDA
STREET, LOS ANGELES**

Dear Mr. Gilmartin:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 7, 2015, pursuant to authority under Health and Safety Code, chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to Health and Safety Code (H&SC), chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit – The facility permit to operate was not available at the time of inspection.	All	October 7, 2015	Ongoing	H&SC 25284(a)
2	Failure to Submit or Update Tank Information (A & B Forms) – The tank information form in CERS contains errors and needs to be updated.	All	October 7, 2015	Ongoing	H&SC 25286(a); 23 CCR 2711(a)
3	Failure to Submit or Update Monitoring Plan – The monitoring plan in CERS contains errors and needs to be updated.	All	October 7, 2015	Ongoing	23 CCR 2632(d)(1)
4	Failure to Maintain Site Plan – The site plan was not available at the time of inspection.	All	October 7, 2015	Ongoing	23 CCR 2711(a)(8)

FELICIA MARGUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, Ca 95812-0100 | www.waterboards.ca.gov

No.	Violation	Tank	Start Date	Stop Date	Regulation
5	Failure to Submit or Update Evidence of Financial Responsibility – CFO letter was signed by someone other than the CFO and the financial responsibility document was not dated.	All	October 7, 2015	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
6	Failure to Maintain Testing, Maintenance, and Repair Records Onsite – Tank 2 had two line leak detectors tested in 2012 and one line leak detector tested in 2013. There were no records onsite that provided details about why the other line leak detector did not get tested in 2013. Annual Monitoring Certification records from 2013 and 2014 were not available at time of inspection, but were submitted a week later. Proof of CUPA approval to store records off-site is required.	All	October 7, 2015	Ongoing	H&SC 25293; 23 CCR 2712(b), 2715(e)
7	Failure to Meet Spill Containment Requirements – Tank 2 had approximately one inch of liquid in the spill container which prevents its ability to hold five gallons.	Tank 2	October 7, 2015	Ongoing	23 CCR 2635(b)(1)
8	Failure to Affix a Tag on Monitoring Equipment Being Certified – The Annual Monitoring Certification tag was not current or readily visible on the following components: line leak detectors on tanks 1 and 2; annular space sensors on tank 1.	All	October 7, 2015	Ongoing	23 CCR 2638(f)
9	Failure to Monitor Product Piping – The sensor in under dispenser container 1/2 is not able to detect a leak at the earliest opportunity because it is not in a vertical position.	Dispenser 1/2	October 7, 2015	Ongoing	23 CCR 2630(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
Rebecca.Green@waterboards.ca.gov

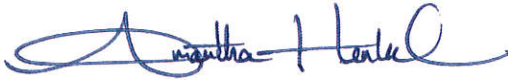
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Mr. Bernard Sanchez
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If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Anna Olekszyk
Acting CUPA Manager
Los Angeles City Fire Department
Anna.Olekszyk@lacity.org

Captain Daniel Dragotto
Captain I
Los Angeles City Fire Department
Daniel.Dragotto@lacity.org

Mr. Bernard Sanchez
Fire Inspector I
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